Pfizer Inc.
235 East 42nd Street
New York, NY 10017

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BY ELECTRONIC DELIVERY

State of Vermont
Office of the Vermont Attorney General
AGO.highcostprescriptiondrugs@vermont.gov

Notice of a New Prescription Drug Pursuant to 18 V.S.A. § 4637(c)

Dear Office of the Vermont Attorney General,

Pfizer Inc. ("Pfizer") is issuing this notice pursuant to 18 V.S.A. § 4637(c), which requires prescription drug manufacturers to provide the Office of the Attorney General (the "Office") with certain information following the release of a drug in the commercial market whose Wholesale Acquisition Cost ("WAC") exceeds the threshold set for a specialty drug under the Medicare Part D Program.

Biohaven Pharmaceuticals Inc. (Biohaven) released Nurtec ODT® (75mg) into the commercial market on March 12, 2020. Nurtec ODT's WAC exceeds the threshold set for a specialty drug under the Medicare Part D Program.

18 V.S.A. § 4637 does not currently define "release of the drug in the commercial market." Further, Pfizer is not aware of any guidance issued by the Office or any Vermont regulation that defines "release of the drug in the commercial market" for the purpose of 18 V.S.A. § 4637.

Statutory Requirement	**Reporting Information**
A description of the marketing and pricing plans used in the launch of the new drug in the United States and internationally.	Biohaven does not believe this information is publicly available and has not released this information in the public domain. Accordingly, Biohaven is limiting its response to this item pursuant to 18 V.S.A. § 4637(d).
The estimated volume of patients that may be prescribed the drug.	Biohaven estimates that there were approximately 4.3M medically eligible patients in the United that could potentially receive Nurtec ODT, which is indicated for the acute treatment of migraines with or without aura in adults.
Was the drug granted breakthrough therapy designation by the federal	Nurtec ODT did not receive breakthrough designation by the federal FDA.

Food and Drug Administration prior to final approval?	
Did the drug receive a priority review by the federal Food and Drug Administration prior to final approval?	Nurtec ODT did receive priority review by the federal FDA.
The date and price of acquisition if the drug was not developed by the manufacturer.	Pfizer Inc. acquired Biohaven, the maker of Nurtec ODT/Vydura (rimegepant), on October 3, 2022, an innovative therapy approved for both acute treatment of migraine and prevention of episodic migraine in adults. The transaction includes the acquisition of Biohaven's CGRP programs, including rimegepant, zavegepant and a portfolio of five pre-clinical CGRP assets. Under the terms of the agreement, we acquired all outstanding common shares of Biohaven not already owned by us for $148.50 per share, in cash, for payments of approximately $11.5 billion, plus repayment of third-party debt of $863 million and redemption of Biohaven's redeemable preferred stock for $495 million. Effective immediately prior to the closing of the acquisition, Biohaven completed the spin-off of Biohaven Ltd. (NYSE: BHVN), distributing Biohaven Ltd.'s shares to Biohaven shareholders. Biohaven Ltd. is a new publicly traded company that retained Biohaven's non-CGRP development stage pipeline compounds. Pfizer, a Biohaven shareholder, received a pro rata portion of Biohaven Ltd.'s shares in the distribution and owns approximately 1.5% of Biohaven Ltd. as of December 31, 2022.

In the event Vermont S. 92 and the laws it implements, including 18 V.S.A. § 4637, are found invalid, Pfizer reserves all of its legal rights. In issuing this notice in an attempt to comply with 18 V.S.A. § 4637, Pfizer does not waive any legal claims or legal rights related to potential constitutional defects with Vermont S. 92.